

RECEIVED

MARK SHANNON WHEELER, #139044
Plaintiff,

v.

BILL SEGREST, et al.
Defendant.

Civil Action No. 2:06-CV-274-MHT

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CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Motion For Order of "CONTEMPT OF COURT" and
"Declaratory Judgment" Against Defendant et al

Comes Now the Plaintiff, Mark Shannon Wheeler in this Honorable District Court of the United STATES for the Middle District of Alabama Northern Division, and Prays this COURT GRANTS this Motion For Order of "Contempt of Court" and "Declaratory Judgment" against Defendant et al.

Grounds: In Compliance with All F.R. Civ. Procedure invoked.

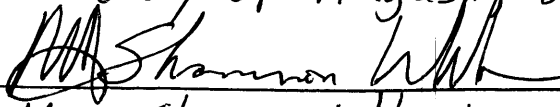
- 1). Defendant Bill Segrest et al., did not Comply with this Honorable Courts ORDER of June 19th, 2006 to file a Supplemental Special report in Compliance of this Courts said order.
- 2). Defendant Bill Segrest et al., did not Comply with this Honorable Courts ORDER of July 14th, 2006, to show (i) Cause why he failed to file a Supplemental Special Report in Compliance with ORDER of June 19th-2006, and (ii) file a Supplemental Special report as was directed by a for mentioned ORDER.
- 3). Defendant Bill Segrest et al., (Counsel) was cautioned (in bold italics of this Honorable Court) that failure to file a Supplemental Special Report in accordance with orders entered in July 14th, 2006 ORDER might result in the imposition of sanctions.

relief sought: — Plaintiff Mark Shannon Wheeler is due, and entitled all relief demanded in instant Complaint and Amended Complaints Continuation of more-further in detailed relief Sought Demands. Plaintiff Wheeler does know that all incarcerated Prisoners in Alabama, both male and female having Completed one third of their sentence, or 10 years, with Violent Felony Convictions, sentenced prior to Feb, 23rd, 2004, is in all actuality, entitled relief. This Court should render Judgment accordingly concerning the Defendants Ex post facto violation that demands this Courts supervision in All Violent Felony Convictions in Alabama. This Court will surely need to make provisions concerning the Defendants Parole Panel that will "desolve" in September, 2006. This Court may deem proper to empanel its own remedy, to secure rights of Plaintiff Mark Shannon Wheeler, and all whom this Courts deems as needing further appropriate Protections. Done this the 7th day of August, 2006. Mark S. Wheeler
Mark S. Wheeler Plaintiff

Certificate of Service

I, Mark Shannon Wheeler hereby certify that I have mailed a copy of the same to the Defendant Bill Segrest et al, by Postage Pre Paid U.S. First Class Mail, and addressed to Defendants Counsel at: Alabama Board of Pardons and Paroles
TO: Steve M. Sirmon, Asst. Attorney General
301 South Ripley St.
P.O. BOX 302405
Montgomery AL. 36130

Done this the 7th day of August 2006.


Mark Shannon Wheeler Ais#139044

Mark Shannon Wheeler
Ais#139044 - KFD#125
Kilby Corr. Fac.
P.O. BOX 150
MT. MEIGS, AL. 36057